

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST PUBLISHING)
CORPORATION,)

Plaintiffs/Counterdefendants,)

v.)

ROSS INTELLIGENCE INC.,)

Defendants/Counterclaimant.)

C.A. No. 20-613-SB

JURY TRIAL DEMANDED

PUBLIC VERSION

**DECLARATION OF CRINESHA B. BERRY IN SUPPORT
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S BRIEFS IN
RESPONSE TO PLAINTIFFS' MOTIONS TO EXCLUDE ROSS INTELLIGENCE
INC.'S EXPERTS**

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*Attorneys for Defendant/Counterclaimant ROSS
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Dated: January 30, 2023
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I, Crinesha B. Berry, declare as follows:

1. I am employed as counsel at Crowell & Moring, LLP, counsel of record for ROSS Intelligence Inc. I am an attorney, admitted to the New York, Michigan, and District of Columbia Bars and have been admitted *pro hac vice* to appear before this Court. I submit this Declaration in support of Defendant/Counterclaimant ROSS Intelligence Inc.’s (“ROSS”) Responses to Plaintiffs’ Motions to Exclude the Opinions and Testimony of ROSS’s Experts Barbara Frederiksen-Cross, Alan Cox, L. Karl Branting, and Richard Leiter.
2. A true and correct copy of excerpts from the Deposition Transcript of Richard Leiter (Oct. 24, 2022) is attached to this declaration as **Exhibit 9**.
3. A true and correct copy of Westlaw Edge’s West Key Number System (Oct. 24, 2022) is attached to this declaration as **Exhibit 10**.
4. A true and correct copy of a screenshot of LexisNexis’s webpage, “What would you like to research today?” (October 24, 2022) is attached to this declaration as **Exhibit 11**.

5. A true and correct copy of excerpts from the Deposition Transcript of Alan Cox (Nov. 2, 2022) is attached to this declaration as **Exhibit 12**.

6. A true and correct copy of the Deposition Transcript of Luther Karl Branting (Oct. 19, 2022) is attached to this declaration as **Exhibit 13**.

7. A true and correct copy of excerpts from the Deposition Transcript of Isabelle Moulinier (July 1, 2022) is attached to this declaration as **Exhibit 14**.

8. A true and correct copy of ROSS's Amended Notice of 30(b)(6) Deposition to Plaintiff Thomson Reuters Enterprise Centre GMBH (Mar. 7, 2022) is attached to this declaration as **Exhibit 15**.

9. A true and correct copy of excerpts from the Deposition Transcript of Khalid Al-Kofahi (Apr. 8, 2022) is attached to this declaration as **Exhibit 16**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at Washington, D.C. on this 30th day of January 2023.

/s/ Crinesha B. Berry

Crinesha B. Berry